

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION**

ROSE L. EPPERSON,  
Individually  
and as class representative for all similarly  
situated persons,

Plaintiff,

v.

INTERNATIONAL PAPER COMPANY,  
KERR-MCGEE  
CHEMICAL CORPORATION,  
KERR-MCGEE OPERATING  
CORPORATION, and BNSF  
RAILWAY COMPANY,

Defendants.

Civil Action No. 2:20-CV-00053

Judge James D. Cain, Jr.

**PLAINTIFF'S NOTICE OF MOTION  
TO COMPEL DEPOSITION  
OF EMILY W. LEE**

**PLEASE TAKE NOTICE THAT** Plaintiff Rose L. Epperson ("Plaintiff") will, and hereby does, move the Court, pursuant to Fed. R. Civ. P. 37, for an order compelling the deposition of Emily W. Lee in her individual; for costs; and for other and further relief that the Court deems just and proper. This motion is based upon: (i) the accompanying memorandum of law, dated September 19, 2025; and (ii) the Declaration of Jason Rotstein, dated September 19, 2025, and the exhibits thereto.

Dated: September 19, 2025

/s/ Perry R. Sanders, Jr.  
Perry R. Sanders, Jr.  
The Sanders Law Firm, LLC  
400 Broad Street  
Lake Charles, LA 70601  
perry@perrysanders.com  
Telephone: 719-630-1556

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on September 19, 2025, a true and correct copy of the foregoing document was served on all counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Perry R. Sanders, Jr.  
Perry R. Sanders, Jr.  
The Sanders Law Firm, LLC  
400 Broad Street  
Lake Charles, LA 70601  
perry@perrysanders.com  
Telephone: 719-630-1556

David L. Wallace  
518 North Pine Street, P.O. Box 489  
DeRidder, LA 70634  
wnblawoffice@bellsouth.net  
Telephone: 337-462-0473

Andrew K. Glenn  
Trevor J. Welch  
Jason Rotstein  
Nathan J. Ades  
Glenn Agre Bergman & Fuentes LLP  
1185 Avenue of the Americas, 22nd Floor  
New York, New York 10036  
aglenn@glennagre.com  
twelch@glennagre.com  
jrotstein@glennagre.com  
nades@glennagre.com  
Telephone: 212-970-1600

*Attorneys for Plaintiff*